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credit is perhaps a hard one, and frowned upon by the courts; but there is no logical reason to justify an exception to the rule in the principal case.

TORTS — PRIVATE ACTION FOR A PUBLIC NUISANCE. — By reason of defendant's wrongful obstruction of a navigable river, plaintiff was compelled to let his steamboat lie idle above the obstruction. *Held*, plaintiff cannot maintain an action against defendant, since the wrong to him differed in degree only, and not in kind, from that sustained by the public at large. *Jones v. Ry. Co.*, 47 Pac. Rep. 226 (Wash.).

It cannot now be questioned that one who suffers a particular damage as a result of a public nuisance may recover his damages in an action at law. Pollock on Torts, 326. It is pretty clear that one who suffers a bodily injury or a physical invasion of corporeal property has sustained a particular damage within the meaning of this rule. But the authorities are most unsatisfactory as to when, if at all, one who suffers more loss than the public at large by reason of not being permitted to use a public highway may maintain an action at law. Cf. *Stetson v. Faxon*, 19 Pick. 147, with *Blackwell v. R. R. Co.*, 122 Mass. 1; *Fritz v. Hobson*, 14 Ch. D. 490, with *Rickett v. Metropolitan Ry. Co.*, 2 H. L. Cas. 175. *Contra* to the principal case, *Dudley v. Kennedy*, 63 Me. 465; *Knowles v. R. R. Co.*, 175 Pa. St. 623.

TRUSTS — BEQUEST ON SECRET UNDERSTANDING. — A testatrix made an absolute bequest of certain property to the executor who had drawn up her will, in case certain declared trusts in previous sections of the will should be held void. *Held*, that the executor's knowledge of the contents of the will implied a secret understanding that he would take bequest on trust; and that as the trust was invalid the next of kin should take. *Edson v. Bartow*, 41 N. Y. Supp. 723. (See NOTES.)

REVIEW.

THE LAW OF RECEIVERS. By Charles Fisk Beach, Jr. Second Edition, with Additions and Changes, by William A. Alderson. New York: Baker, Voorhis & Co. 1897. pp. lxx, 950.

This is a considerably enlarged edition of Mr. Beach's well known work on Receivers, containing all the additions and alterations necessary in a subject which has been so much developed in this country since the time when the original edition was published. It appears to be a very complete treatise on every portion of the law relating to this peculiarly modern and American piece of judicial machinery. We say peculiarly modern and American, because the employment of receivers, though in its origin, perhaps, as old as equity, has only in this country, and within less than half a century, become a topic of such importance as to deserve extended and separate consideration. Mr. Alderson seems to have done the work of collecting the later authorities with great thoroughness, and some of the sections which he has added contain remarkably far-sighted discussions of questions of present importance; but his style is decidedly careless compared with that of Mr. Beach. We should be glad to learn how to parse certain of his sentences (for examples see p. 72, line 11, and p. 881, line 8). The printer is perhaps responsible for these slips, as may be suspected from a sprinkling of misprints rather plentiful for a volume of such a good general appearance. On p. 697, at line 12, for instance, the important little word "not" seems to be lacking, and on p. 49 there are two misprints, one at line 15, and the other in note 2 at line 12. The book is well arranged, and contains a comprehensive index.

R. G.